

Mrs Kristen Butchatsky



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Committee Secretary  
House Standing Committee on Social Policy and Legal Affairs  
House of Representatives  
PO Box 6021  
Parliament House  
Canberra ACT 2600

Dear Sir/Madam,

Thankyou for the opportunity to make a submission to the Inquiry into the regulation of billboard and outdoor advertising. As the parent of young children and a member of the community at large, I would like to express my grave concerns about current practice in billboard advertising. It is my firm opinion that since billboard and outdoor advertising is viewed by a general audience including children, and that members of the public are not necessarily able to 'switch off' the communication, this form of advertising needs to be subject to stricter guidelines and controls, including penalties for contravention. It is obvious to me that self-regulation and the Advertising Standards Board have failed as a strategy for ensuring that ethical standards are not breached. I would argue rather, that 'prevailing community standards', as they are termed, have actually been degraded as people have been continually bombarded with images and messages that promote, among other things, the sexualisation and objectification of women. Advertisers and marketers have knowingly contributed to what is now a sex-saturated society, and recent research has shown the damage this sort of society is causing to the health and wellbeing of all its members, but particularly to children and young girls. The display of 'pornified' images of women in the workplace is legally considered to be sexual harassment. Why should our public spaces be any different? I would argue that advertisements which portray the female body in a hyper-sexualised way, as objects of desire, in order to titillate and therefore sell a product, should also be brought under tighter control.

In relation to the current self-regulatory scheme, it seems apparent that the AANA is not in a position to uphold its own ethical code, given that, as a body representing advertisers, it has a vested interest in this code being flexible and easily manipulated if it benefits the advertisers. Even the supposed moral backdrop of 'prevailing community standards' against which the ethical code is presented, is not able to be meaningfully defined or described, and is therefore easily manipulated. Notwithstanding this, the AANA's Code of Ethics, as displayed on its website, makes the following statements:

- 2.1 *Advertising or Marketing Communications shall not portray people or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, sex, age, sexual preference, religion, disability or political belief.*
- 2.3 *Advertising or Marketing Communications shall treat sex, sexuality and nudity with sensitivity to the relevant audience and, where appropriate, the relevant programme time zone.*

It is quite clear that this Code has not been able to be enforced in any real way, since billboard advertisements regularly appear which portray women in a demeaning and sexualized way, and use an inappropriate level of nudity. Moreover, the statement in Point 2.3 that the communications shall treat sex etc with *sensitivity to the relevant audience* is completely meaningless when put in the context of billboard advertising. The relevant audience for billboard advertising includes children. They may not be the 'target audience' for marketers, but they have full and complete access to these communications. According to the AANA's Code for Advertising and Marketing Communications to Children, no advertisement is to: *include sexual imagery in contravention of Prevailing Community Standards; or to state or imply that Children are sexual beings and that ownership or enjoyment of a Product will enhance their sexuality.* How can the AANA possibly say these codes are being generally upheld when billboards advertising Sexpo, and others asking if we want longer-lasting sex, are on show to children, along with ads for products such as chocolate and ice-cream which feature semi-naked women in sexualized poses? Furthermore, by displaying such ads in places where children can view them, advertisers are directly contravening the code's statement that: *Advertising or Marketing Communications to Children...must not undermine the authority, responsibility or judgment of parents or carers.* When parents are unable to stop their child from being confronted with these inappropriate and possibly harmful images, their parental authority has been seriously undermined.

In regard to the role of the Advertising Standards Bureau, I believe the way to make a complaint to the bureau is currently not widely known in the community, and once a complaint is lodged, the length of time it takes to have an offending billboard removed is so long it practically negates the point of complaining in the first place. The fact that there are no penalties in place for breaching ethical codes means there is nothing to deter companies from running further ads in a similar vein.

My suggestion for a way forward is to put in place a system similar to the current system of film and television classification, in which content is given a rating, before it is released, as to whether or not it is suitable for viewing by children. This serves as a guide not only for parents but also for adults wishing to filter their own consumption. Because of the general audience for billboard advertising, only the material given a 'G' rating or equivalent, would then be suitable for display. I believe this would not place an unhelpful 'burden' on business but instead force advertisers to be more creative and imaginative rather than constantly resorting to the old mantra that 'sex sells'.

I wish you well in this discussion and decision-making process and trust you will facilitate a better solution for children and for the community.

Yours faithfully,

Kristen Butchatsky